

## **REMARKS**

Claims 1-57 are pending. Claims 1, 18, 34, 41, and 52 are amended.

In the Non-final Office Action mailed on September 2, 2005, the Examiner objected to the specification, objected to claim 52 for informalities, rejected claims 1, 8-9, 12-14, 16-18, 25-26, 29-31, 33-36, 38-39, 41-43, 45, 50 and 57 under 35 U.S.C. § 102(e); and rejected claims 2-7, 11, 19-24, 28, 46-49, and 51-56 under 35 U.S.C. § 103(a).

In this response, claims 1, 18, 34, 41, and 52 are amended. For the reasons set forth in detail below, applicant submits that the present application, including each of pending claims 1-57, is in condition for allowance.

### **Objection to Specification**

The Examiner objected to the specification for incorporation of improper references to the application, because on pages 1 through 3 the application has failed to provide the Application Serial Numbers or Patent Numbers of the references. The undersigned has hereby amended the "CROSS-REFERENCE TO RELATED APPLICATION(s)" section of the specification starting from page 1 through page 3 and has added the Application Serial Numbers and/or Patent Numbers of the references. Therefore, the undersigned respectfully requests the withdrawal of this objection.

### **Objection to Claim 52**

The Examiner objected to claim 52 as erroneously depending from claim 49 instead of claim 51. Claim 52 is hereby amended to depend from claim 51. Therefore, the undersigned respectfully requests the withdrawal of this objection.

**Rejection Under 35 U.S.C. § 102(e) of Claims 1, 8-9, 12-14, 16-18, 25-26, 29-31, 33-36, 38-39, 41-43, 45, 50 and 57**

The Examiner rejected claims 1, 8-9, 12-14, 16-18, 25-26, 29-31, 33-36, 38-39, 41-43, 45, 50 and 57, which include independent claims 1, 18, 34, 41, and 50, under 35 U.S.C. § 102(e) as being anticipated by Anderson et al. (US Pat. No. 6,597,691). Independent claims 1, 18, 34 and 41 are hereby amended to further clarify the term "domain address" and overcome the Examiner's rejection, as described below.

The amended independent claims 1, 18, 34 and 41 and the means-plus-function claim 50 recite a domain address that may be used by multiple routing devices belonging to the same domain. Furthermore these claims recite that if the domain address associated with a frame that is received by a routing device does not match the domain address associated with the routing device then the frame will be routed to its proper destination domain using the domain address associated with the frame. Support for these amendments is found in paragraph [0027] and [0029].

The Examiner maintains that "CN" (Chassis Number) of Anderson is similar to the "domain address" in the rejected claims. The undersigned respectfully submits that not only the term "domain" itself is nonexistent in Anderson, but also the concept of "domain" and "domain addressing" is nonexistent in Anderson. Anderson specifically and expressly states that CN identifies a single chassis (col. 5, lines 44-47). Anderson does not use CN to send anything from one domain of multiple devices to another domain of multiple devices.

For a claim to be rejected based on anticipation under 35 U.S.C. §102(a), (b), and (e), MPEP 2131 requires that: "to anticipate a claim, the reference must teach every element of the claim." Anderson does not teach, suggest, or even imply what is recited in the amended independent claims 1, 18, 34 and 41 and the means-plus-function claim 50 and, therefore, a *prima facie* case of anticipation under Section 102 has not been

established with respect to these independent claims and accordingly the undersigned requests the withdrawal of the Section 102 rejection of these claims.

Claims 8-9, 12-14, 16-17, 25-26, 29-31, 33, 35-36, 38-39, 42-43, 45 and 57 depend from independent claims 1, 18, 34, 41 and 50, and accordingly include the features of independent claims 1, 18, 34, 41 and 50. For reasons discussed above and for the additional features of these claims, a *prima facie* case of obviousness under Section 102 has not been established with respect to these dependent claims either, and accordingly the Section 102 rejection of claims 8-9, 12-14, 16-17, 25-26, 29-31, 33, 35-36, 38-39, 42-43, 45 and 57 should also be withdrawn.

#### **Rejection Under 35 U.S.C. § 103(a) of Claims 2-7, 11, 19-24, 28, 46-49, and 51-56**

The Examiner rejected dependent claims 2-7, 11, 19-24, 28, 46-49, and 51-56 under 35 U.S.C. § 103(a) as being unpatentable over Anderson et al. (US Pat. No. 6,597,691) in view of Tasaki et al. (US Pat. No. 6,895,006).

Claims 2-7, 11, 19-24, 28, 46-49, and 51-56 depend from allowable independent claims 1, 18, 34, 41, and 50, discussed above, and accordingly include the features of the independent claims 1, 18, 34, 41, and 50. For reasons discussed above and for the additional features of these claims the rejection of dependent claims 2-7, 11, 19-24, 28, 46-49, and 51-56 should be withdrawn.

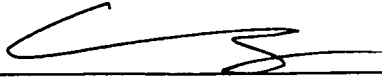
#### **Conclusion**

In view of the foregoing, all of the claims pending in the application are in condition for allowance and, therefore, a Notice of Allowance is respectfully requested. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-6488.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-0665, under Order No. 030048026US from which the undersigned is authorized to draw.

Dated: 11/3/05

Respectfully submitted,

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